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10 [Names and addresses of other parties and their
counsel appear at end]
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14 UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
15 SAN FRANCISCO DIVISION
16

17 In re DYNAMIC RANDOM ACCESS
18 MEMORY (DRAM) ANTITRUST
LITIGATION

No. M-02-1486-PJH

MDL No. 1486

19 This Document Relates To:

20 ALL ACTIONS
21
22
23

**STIPULATION AND [~~PROPOSED~~]
ORDER TO APPLY PROTECTIVE
ORDER TO INDIRECT-PURCHASER
PLAINTIFFS' COUNSEL**

STIPULATION

WHEREAS this Court previously entered a Stipulation and Protective Order in the above-captioned case on July 11, 2003 (the "Protective Order");

WHEREAS since the entry of that Protective Order, a number of cases filed in various state and federal courts on behalf of indirect purchasers of DRAM have been consolidated with this case for pre-trial proceedings;

WHEREAS additional cases on behalf of indirect purchasers of DRAM may be consolidated with this case for pre-trial proceedings;

WHEREAS counsel in these newly consolidated indirect-purchaser cases and in any later consolidated indirect-purchaser cases (the "Indirect-Purchaser Plaintiffs' Counsel") may participate in discovery and have access to proprietary and confidential information and documents; and

WHEREAS Indirect-Purchaser Plaintiffs' Counsel have agreed to protect the confidentiality of such information and documents and be bound by the Protective Order.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED as follows:

The parties agree that the Protective Order entered by the Court on July 11, 2003 shall apply to Indirect-Purchaser Plaintiffs' Counsel, as if each such counsel had been a signatory to the original Stipulation and Protective Order.

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**Indirect-Purchaser Plaintiffs' Co-Lead
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**Indirect-Purchaser Plaintiffs' Co-Lead
Counsel signing on behalf of all Indirect-
Purchaser Plaintiffs for purposes of this
stipulation**

DATED: 10/25/05

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Indirect-Purchaser Plaintiffs' Liaison Counsel

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DATED: 10/29/15

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12 **and Micron Semiconductor Products, Inc. signing on**
13 **behalf of all Defendants for purposes of this**
14 **stipulation**

15 DATED: 10/27/05

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ORDER

Based on the stipulation of the parties, and for good cause shown, the foregoing is hereby SO ORDERED.

DATED: 11/3/05 _____



PHYLLIS J. HAMILTON
UNITED STATES DISTRICT JUDGE

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